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Marine Insurance.—A marine underwriter is held, in *Standard Marine Ins. Co. v. Nome Beach L. & T. Co.* (C. C. A. 9th C.) 1 L. R. A. (N. S.) 1095, not to be liable for a loss occurring through the deliberate act of the master in pushing through dangerous ice for the purpose of reaching his destination quickly.

Intoxicating Liquors—License Tax—Ferry Boats.—The power of a state to require the keeper of a bar on a ferryboat making regular trips from another state, where it is owned, to pay a license tax for the privilege of selling liquors while the boat is in the former state, is upheld in *Harrell v. Speed* (Tenn.) 1 L. R. A. (N. S.) 639.

Divorce—Decree.—A decree of divorce is held, in *Nolan v. Dwyer* (Wash.) 1 L. R. A. (N. S.) 551, not to be subject to be vacated after the death of one of the parties.

A decree of divorce rendered against a nonresident on service by publication is held, in *Forrest v. Fey* (Ill.) 1 L. R. A. (N. S.) 740, to be void and subject to collateral attack, where the record failed to show that there was an affidavit of nonresidence, as required by statute.

Estoppel in Pais—Rent.—One who took possession of premises under an arrangement with the grantor, and subsequently agreed to pay rent to the grantee for a certain period, is held, in *Hodges v. Waters* (Ga.) 1 L. R. A. (N. S.) 1181, not to be estopped to deny liability to the latter for rent after the expiration of the term of such agreement although he remained in possession of the premises.

Trade Fixtures.—The right of a tenant to remove trade fixtures placed on the premises is held, in *Wadman v. Burke* (Cal.) 1 L. R. A. (N. S.) 1192, to be lost by entering into a new lease containing no recognition of his title to the fixtures, and binding him to surrender the premises in as good state and condition as reasonable use and wear would permit.

Larceny—Wages.—One who induced another to part with money as a wager on a pretended event which was not to take place, with the intention of appropriating it to his own use, is held, in *State v. Ryan* (Or.) 1 L. R. A. (N. S.) 862, to be guilty of larceny in making such appropriation.

Forced Sale—Exemptions.—The right to have personal property exempted from forced sale is held, in *Brown v. Beckwith* (W. Va.) 1 L. R. A. (N. S.) 778, not to be forfeited on the ground of non-residence until removal has commenced, although the intention to leave the state permanently has been formed, and the property delivered for shipment to a point outside the state.